

BROWN & ROSEN LLC

Attorneys At Law
100 State Street, Suite 900
Boston, MA 02109
617-728-9111 (T)
617-695-3202 (F)
www.brownrosen.com

September 15, 2017

Netburn_NYSDChambers@nysd.uscourts.gov

Hon. Judge Sarah Netburn
United States Courthouse
40 Centre Street
New York, NY 10007

Case Name: Breathe LLC et al v. White Fox Ventures, Inc. et al

Case Number: 1:17-cv-00367-VM

Dear Hon. Judge Netburn:

This office is counsel to the Plaintiffs in this matter. This Status Letter is prepared by counsel jointly. The deposition of the Plaintiffs and Mr. Shaw will occur on October 12, 2017. The deposition of White Fox Ventures, Inc. will occur on October 13, 2017 via video.

Plaintiff will be responding to White Fox Ventures, Inc. document request by September 21, 2017. Plaintiff also seeks to inform the court of the possibility of an expert in the securities field to address Plaintiff's claim associated with its inability to sell it shares of White Fox Ventures, Inc. stock.

In addition, the parties have discussed settlement but no resolution has been reached at this time.

Plaintiff will also be filing a Motion to Amend the Complaint to add causes of actions associated with the violation of federal securities laws.

By:

A handwritten signature in black ink, appearing to read 'C. Brown', is written over a light blue rectangular background.

Christopher L. Brown

Cc: Ira Greenberg, Esq via email
Seth Shaw, via email